

AUG 10 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,)

vs.)

PLAINTIFFS' INITIAL
DISCLOSURES

JUNG JIN CORPORATION, a CNMI corporation,)
ASIA ENTERPRISES, INC., a CNMI corporation,)
PARK HWA SUN and KIM HANG KWON,)

Defendants.)

COMES COMES NOW, Plaintiffs LI YING HUA, LI ZHENG ZHE and XU JING JI, by and through their attorney, pursuant to Fed. R. Civ. P. 26(a)(1) and LR 16.2CJ(d), with the following disclosures:¹

A. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION

The following individuals and entities are likely to have discoverable information that Plaintiffs may use to support their claims in this case:

1. Plaintiffs who may be contacted through their attorney of record at the address and phone numbers above listed;
2. Defendants;

¹ A copy of Plaintiffs' Initial Disclosures has been filed with the Court. See L.R. 16.2CJ.d.

ORIGINAL

1 3. Mr. Song, Cheng Gen, a former security guard for Defendants, now works at another
2 poker room in Susupe and may be contacted as 235-0803.

3 4. Mr. Zhao (given names unknown), a former security guard for Defendants. Mr.
4 Zhao's present contact information is not known to Plaintiffs, but Plaintiffs will
5 amend these disclosures if the information becomes known to Plaintiffs hereafter.

6 5. Several other past and present employees and or associates of Defendants and their
7 business, may have information Plaintiffs may use to support their claims in this case.

8 Plaintiffs reserves the right to amend and supplement this list if additional information
9 becomes available during the course of discovery, pursuant to Fed. R. Civ. P. 26(e).

10 **B. LISTING, DESCRIPTION AND LOCATION OF DOCUMENTS, DATA**
11 **COMPILATIONS AND TANGIBLE THINGS**

- 12 1. Annual Corporation Report for Asia Enterprises Incorporated filed February 19, 2004;
- 13 2. Annual Corporation Report for Jung Jin Corporation filed February 19, 2004;
- 14 3. Copy of passport, social security card, and entry permits of Li Zheng Zhe;
- 15 4. Checks stubs for various payments purportedly made to Li Zheng Zhe in 2004;
- 16 5. Copy of passport, social security card, and entry permits of Li Ying Hua;
- 17 6. Checks stubs for various payments purportedly made to Li Ying Hua in 2004;
- 18 7. Copy of passport, social security card, and entry permits of Xu Jing Ji;
- 19 8. Checks stubs for various payments purportedly made to Xu Jing Ji in 2004;
- 20 9. Letter in Chinese signed by Li Zheng Zhe dated May 5, 2005 (possibly privileged);
- 21 10. Letter in Chinese signed by Li Ying Hua dated May 5, 2005 (possibly privileged);
- 22 11. Letter in Chinese signed by Xu Jing Ji dated May 5, 2005 (possibly privileged);
- 23 12. Receipt from the CNMI Divison of Revenue and Taxation dated April 14, 2005
24 regarding wage and salary tax payment for Xue Jing Ji;
- 25 13. Check stub for check purportedly issued in the amount of \$1,050.00 written on
26 account of Asia Enterprises, Inc.

1 Plaintiffs reserve the right to amend and supplement this list if additional information
2 becomes available during the course of discovery, pursuant to Fed. R. Civ. P. 26(e).

3 **C. COMPUTATION OF DAMAGES**

4 Reserving the right to modify or amend the dates, hours and/or amounts provided to reflect,
5 more accurately, the nature of Plaintiffs' damages based on subsequent information and evidence
6 obtained, attached hereto is a rough calculation of Plaintiffs' damages, excluding interest, costs and
7 attorney's fees, calculated based on preliminary information subject to further clarification and
8 refinement through discovery. Without admitting that such wage rates are the applicable, legal, rates,
9 the hourly rates used therein are \$3.05 per hour based on the CNMI minimum wage rate applicable
10 for the relevant pay period. Base rate(s) may subject to upward adjustment pursuant to 29 U.S.C.
11 § 207(e) in order to determine the proper amount of the applicable overtime premium. The
12 preliminary overtime premiums used in the Calculation of Damages attached are one and one-half
13 times Plaintiffs' base rates as stated above before any § 207(e) adjustment. Some of the "wages paid"
14 in the Calculation of Damages have been "annualized" and re-calculated based on bi-weekly pay
15 periods. The total wages paid should reflect Plaintiffs' total actual wages received through their
16 employment with Defendants. In some instances, illegal deductions from Plaintiffs' salaries have
17 been grouped together, and the timing of the illegal deductions as reflected in the preliminary
18 calculation of damages may be inaccurate and will be clarified and corrected through the course of
19 discovery.

20 **D. LIABILITY INSURANCE AGREEMENT**

21 Defendants, or any of them, may have, or may have had, various policies of insurance that
22 would cover some or all of the claims advanced by Plaintiffs in this matter. However, the existence
23 and terms of such policy or policies are unknown to Plaintiffs and, therefore, need to be identified
24 and produced by Defendants in their initial disclosures.
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1 E. CERTIFICATION

2 Pursuant to Fed. R. Civ. P. 26(g)(1), I hereby certify that to the best of my knowledge,
3 information, and belief, formed after reasonable inquiry, that the above disclosure is complete and
4 correct as of the date set forth below.

5 Respectfully submitted this 9th day of August, 2005.

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7
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15 Attorney for Plaintiffs
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LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
4/6/03	24.0		3.05	4.58	73.20	0.00		73.20	150.00	223.20	446.40
4/20/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
5/4/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
5/18/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
6/1/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
6/15/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
6/29/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
7/13/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
7/27/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
8/10/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
8/24/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
9/7/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
9/21/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
10/5/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08

LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
10/19/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
11/2/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
11/16/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
11/30/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
12/14/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
12/28/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
1/11/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
1/25/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
2/8/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
2/22/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
3/7/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
3/21/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
4/4/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
4/18/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08

LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
5/2/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
5/16/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
5/30/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
6/13/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
6/27/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
7/11/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
7/25/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
8/8/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
8/22/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
9/5/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
9/19/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
10/3/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
10/17/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
10/31/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08

LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
11/14/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
11/28/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
12/12/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
12/26/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
1/9/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
1/23/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
2/6/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
2/20/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
3/6/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
3/20/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
4/3/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
4/17/05	80.0	88.0	3.05	4.58	244.00	403.04		647.04		647.04	1294.08
5/1/05	80.0	88.0	3.05	4.58	244.00	403.04		647.04	215.00	862.04	1724.08
5/15/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
5/29/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/12/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/26/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/10/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/24/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/7/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/21/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/4/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/18/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/2/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/16/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/30/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/13/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/27/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
12/11/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/25/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/8/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/22/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
								0.00			
	5,864	4,752			17,885.20	21,764.16	15,600.00	24,049.36	4,615.00	28,664.36	57,328.72

LI ZHENG ZHI CALCULATION OF DAMAGES
(November 25, 2001 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
12/02/01	40.0	65.0	3.05	4.58	122.00	297.70	392.30	27.40	150.00	177.40	354.80
12/16/01	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
12/30/01	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
1/13/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
1/27/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	100.00	547.10	1094.20
2/10/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
2/24/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	100.00	547.10	1094.20
3/10/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
3/24/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	100.00	547.10	1094.20
4/7/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
4/21/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	100.00	547.10	1094.20
5/5/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
5/19/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	100.00	547.10	1094.20
6/2/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

6/16/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
6/30/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
7/14/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
7/28/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
8/11/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
8/25/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
9/8/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
9/22/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
10/6/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
10/20/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
11/03/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
11/17/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
12/1/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
12/15/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
12/29/02	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
1/12/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
1/26/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
2/9/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
2/23/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
3/9/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
3/23/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
4/6/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
4/20/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
5/4/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
5/18/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
6/1/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
6/15/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
6/29/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

7/13/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
7/27/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
8/10/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
8/24/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
9/7/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
9/21/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
10/5/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
10/19/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
11/2/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	150.00	597.10	1194.20
11/16/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
11/30/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
12/14/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
12/28/03	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
1/11/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
1/25/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
2/8/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
2/22/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
3/7/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
3/21/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
4/4/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
4/18/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
5/2/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
5/16/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
5/30/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
6/13/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
6/27/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
7/11/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
7/25/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20

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2/6/05	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
1/23/05	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
1/9/05	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
12/26/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
12/12/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
11/28/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
11/14/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
10/31/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
10/17/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
10/3/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
9/19/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
9/5/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	497.10	994.20
8/22/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
8/8/04	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

LI ZHENG ZHI CALCULATION OF DAMAGES
(November 25, 2001 to January 24, 2006)

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
2/20/05	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
3/6/05	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
3/20/05	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10		447.10	894.20
4/3/05	80.0	130.0	3.05	4.58	244.00	595.40	392.30	447.10	75.00	522.10	1044.20
4/17/05	80.0	130.0	3.05	4.58	244.00	595.40	327.60	511.80		511.80	1023.60
5/1/05	80.0	40.0	3.05	4.58	244.00	183.20		427.20		427.20	854.40
5/15/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
5/29/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/12/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/26/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/10/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/24/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/7/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/21/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
9/4/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/18/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/2/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/16/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/30/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/13/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/27/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/11/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/25/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/8/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/22/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
2/5/06	16.0		3.05	4.58	48.80	0.00		48.80		48.80	97.60
	8,696	11,545			26,522.80	52,876.10	34,850.00	44,548.90	5,500.00	50,048.90	100,097.80

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6/13/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
5/30/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
5/16/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
5/2/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
4/18/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
4/4/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
3/21/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
3/7/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
2/22/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
2/8/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
1/25/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
1/11/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
12/28/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	150.00	497.04	994.08
12/14/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08

PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
A	B	C	D	E	F	G	H	I	J	K	L

XU JING JI CALCULATION OF DAMAGES
(December 1, 2003 to January 24, 2006)

XU JING JI CALCULATION OF DAMAGES

(December 1, 2003 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
6/27/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
7/11/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
7/25/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
8/8/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
8/22/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
9/5/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	397.04	794.08
9/19/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
10/3/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
10/17/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
10/31/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
11/14/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
11/28/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
12/12/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
12/26/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08

XU JING JI CALCULATION OF DAMAGES

(December 1, 2003 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
1/9/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
1/23/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
2/6/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
2/20/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
3/6/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
3/20/05	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
4/3/05	80.0	88.0	3.05	4.58	244.00	403.04	200.00	447.04	75.00	522.04	1044.08
4/17/05	80.0	88.0	3.05	4.58	244.00	403.04		647.04		647.04	1294.08
5/1/05	40.0	32.0	3.05	4.58	122.00	146.56		268.56	125.00	393.56	787.12
5/15/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
5/29/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/12/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/26/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/10/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

XU JING JI CALCULATION OF DAMAGES
(December 1, 2003 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
7/24/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/7/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/21/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/4/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/18/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/2/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/16/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/30/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/13/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/27/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/11/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/25/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/8/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/22/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

XU JING JI CALCULATION OF DAMAGES

(December 1, 2003 to January 24, 2006)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
2/5/06	16.0		3.05	4.58	48.80	0.00		48.80		48.80	97.60
	4,456	3,200			13,590.80	14,656.00	10,400.00	17,846.80	2,025.00	19,871.80	39,743.60